

Message

From: d'Almeida, Carolyn K. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9EC4401AFA1846DD93D52A0DDA973581-CDALMEID]
Sent: 10/5/2016 6:24:22 PM
To: Davis, Eva [Davis.Eva@epa.gov]
Subject: RE: ST012 Containment Field Variance Memo

Thanks Eva – I was looking for that but did not see it the first time.

From: Davis, Eva
Sent: Wednesday, October 05, 2016 8:37 AM
To: d'Almeida, Carolyn K. <dAlmeida.Carolyn@epa.gov>; Levine, Herb <Levine.Herb@epa.gov>; Wayne Miller <Miller.Wayne@azdeq.gov>
Cc: Henning, Loren <Henning.Loren@epa.gov>
Subject: RE: ST012 Containment Field Variance Memo

Hi Carolyn –

Working on reviewing these 2 documents now. Not sure what you mean in your first comment. They propose to use an air stripper to strip the contaminants from the water (if needed), then the vapors will be sent to the SVE thermox (4th full paragraph on page 5 of this memo). The way I read this is that if they are using the air stripper (which I assume means, if dissolved phase concentrations are high enough to warrant its use), the vapors generated will go to the thermox.

I agree that a re-circulation system during EBR would be better than their current proposal to dump the stuff and run --

I hope to have my comments to you on both memos by the end of the week.

Eva

From: d'Almeida, Carolyn K.
Sent: Friday, September 30, 2016 5:37 PM
To: Davis, Eva <Davis.Eva@epa.gov>; Levine, Herb <Levine.Herb@epa.gov>; Wayne Miller <Miller.Wayne@azdeq.gov>
Cc: Henning, Loren <Henning.Loren@epa.gov>
Subject: FW: ST012 Containment Field Variance Memo

I skimmed through this briefly; just a few comments:

- 1) Why are they proposing to use an air stripper instead of venting vapors through the thermox? Did not see plans for monitoring of stripper emissions. They seem to only be using air stripper in the event they have to add chemicals for biofouling or descaling, but benzene emissions from air stripper could be significant if they're not using vGAC on the stripper.
- 2) Comment under 6.0 b at bottom of page 10 seems to suggest that the extraction system will not be needed after EBR is implemented. Not sure what their justification for that assumption is.

Carolyn

From: Smallbeck, Donald R. [mailto:Donald.Smallbeck@amecfw.com]
Sent: Friday, September 30, 2016 10:18 AM

To: d'Almeida, Carolyn K. <dAlmeida.Carolyn@epa.gov>; Wayne Miller <Miller.Wayne@azdeg.gov>
Cc: JERRARD, CATHERINE V CIV USAF HAF AFCEC/CIBW <catherine.jerrard@us.af.mil>; (Geoffrey.Watkin@cn-bus.com) <Geoffrey.Watkin@cn-bus.com>; Pearson, Stuart C. <Stuart.Pearson@amecfw.com>; Davis, Eva <Davis.Eva@epa.gov>; Dan Pope <DPope@css-dynamac.com>; Rohrbaugh, Amanda <ARohrbaugh@TechLawInc.com>; Brasaemle, Karla <KBrasaemle@TechLawInc.com>; Levine, Herb <Levine.Herb@epa.gov>; steve@uxopro.com; Bo Stewart <bo@praxis-enviro.com>

Subject: ST012 Containment Field Variance Memo

BCT members

On behalf of the Air Force (AF), please find attached the ST012 Containment Field Variance Memo (FVM). The AF and Amec Foster Wheeler are preparing to start implementing the construction for containment as described in the FVM the week of October 10, 2016. To support this schedule, it would be appreciated if EPA and ADEQ could identify any comments or concerns with the FVM by 10 October 2016. If we do not hear from the EPA or ADEQ by October 10, 2016 construction activities will proceed. Please let Cathy know if additional information is needed or it would be useful to have a conference call prior to mobilization.

Additionally, The AF offers the following responses to the elements requested for the work plan in the email from EPA dated 15 September 2016.

- * which wells will be used; **Response: The wells are listed.**
- * well construction details; **Response: Well construction diagrams are included.**
- * intended extraction rates; **Response: Wells will be level controlled rather than flow controlled. Estimates of overall extraction rates are discussed but will be refined during optimization.**
- * hydraulic capture model; **Response: Hydraulic capture modelling is not necessary at this time. AF expects to establish containment through active extraction and monitoring as was conducted during the pre-SEE containment extraction period. The evaluation of containment effectiveness would be based on post-SEE characterization results, the new monitoring network, and the observed hydraulic response after startup of the containment extraction system.**
- * pumps to be used and contingency for backup replacement pumps; **Response: Pump model numbers and number of backups are indicated.**
- * consideration of accumulated NAPL recovery in pumped wells; **Response: Discussion of considerations for accumulated LNAPL are included.**
- * treatment system design and configuration; **Response: Treatment system design and configuration from Addendum 2 is included.**
- * field logistics/ personnel; and **Response: An estimated schedule is provided.**
- * health and safety concerns with heated fluids **Response: Health and safety aspects are included.**

D.R. Smallbeck
Principal Program Manager
Construction Remediation

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